

Warrington Updated Proposed Submission Version Local Plan (2021-2038)

Detailed Planning Representations on behalf of
Homes England and Miller Homes

15th November 2021



1. Introduction

- 1.1. These representations have been prepared by WSP on behalf of Homes England and Miller Homes in collaboration with Barton Willmore.**
- 1.2. Pursuant to Regulation 19 of Town and Country Planning Act (Local Planning) (England) Regulations 2012 (as amended), they respond to the recently published consultation by Warrington Borough Council (WBC) on its Updated Proposed Submission Version Local Plan 2021-2038 (UPSVLP) (September 2021) and specifically, proposals for a new South East Warrington Urban Extension (SEWUE) pursuant to Draft Policy MD2.
- 1.3. A plan showing the extent of Homes England and Miller Homes' land interests relevant¹ to the proposed allocation is provided at [Appendix 1](#).
- 1.4. Homes England is the Government's housing accelerator. The Agency has the appetite, influence, expertise, and resources to drive positive market change. By releasing more land to developers who want to make a difference, Homes England is making possible the new homes England needs, helping to improve neighbourhoods and grow communities. Homes England has a strong track record of delivering sustainable growth in Warrington and has considerable experience of promoting and delivering large scale residential-led development across England.
- 1.5. Miller Homes is a respected national homebuilder with a focus on building high quality family homes in established regional markets. They operate from three divisions – Scotland, North of England, Midlands & South. It has nine regional offices with a strong presence in sought after suburban locations which continue to benefit from strong demand.
- 1.6. Despite the impact of the COVID-19 pandemic in 2020, Miller Homes delivered its ninth consecutive year of profit, building 2,620 homes throughout England and Scotland. This year, the North West Region alone is on target to deliver around 400 homes, increasing to 500 in 2022. This year's acquisition of Wallace Land Investments (WLI) saw the Group's strategic land portfolio increase by circa 18,000 plots, including significant land interests in Warrington in particular.
- 1.7. Miller Homes has a strong track record of housing delivery including on large scale sites such as South Warrington, where partnership working with adjoining landowners and developers is required to deliver site-wide infrastructure across multiple phases of development over many years. Further details on its capability are provided separately on behalf of Miller Homes.
- 1.8. Homes England owns its land interests in Warrington freehold and has previously made representations to the Local Plan pertaining to its land interests in South Warrington. The land being promoted by Miller Homes has also been the subject of representations which were previously submitted on WLI. Based on WLI's acquisition, Miller Homes is now acting on behalf of the individual freehold interests.

¹ Both Homes England and Miller Homes have other land interests outside of the SEWUE in Warrington. Where relevant and necessary, separate submissions are being made in respect of these other land interests.

Joint working commitments

- 1.9. Collectively, Homes England and Miller Homes are the principal landowners (and hereafter referred to as such) of the proposed allocation. They are collectively committed to:
- Securing the allocation of the SEWUE within the adopted Warrington Local Plan;
 - Delivering the SEWUE with a minimum of 4,200 homes in total, including at least 2,400 homes delivered within the Plan Period; and
 - Delivering and supporting necessary infrastructure to meet the needs of the new development.
- 1.10. To deliver these objectives, Homes England and Miller Homes jointly agree to:
- Work together to support the SEWUE allocation within the Warrington Local Plan, through consultation, submission, Examination and adoption;
 - Work together on Plan promotion, the required Development Framework and planning permissions within the SEWUE as appropriate - albeit the parties reserve the right to submit separate representations to the Local Plan process and separate planning applications;
 - Seek to accelerate delivery of residential development within the SEWUE, within the Plan period and beyond;
 - Facilitate the timely and appropriately phased delivery of necessary infrastructure in support of the SEWUE and facilitate comprehensive development of the whole allocation;
 - Avoid action which could result in stalling of new development within any part of the Urban Extension, including commitment to a no “ransom” position between the two parties;
 - Manage the delivery of necessary strategic infrastructure on a proportionate and equitable basis between the two parties (which accounts for capital costs as well as land value impairment); and
 - Prepare and submit appropriate agreements to demonstrate joint working, for example a strategic infrastructure delivery agreement (i.e. within a Statement of Common Ground or similar).
- 1.11. Both parties are fully committed to working jointly and collaboratively with Warrington Borough Council and Warrington & Co in finalising and adopting the Local Plan and demonstrating the deliverability and viability of the SEWUE through robust, evidence led infrastructure requirements and costs.

Progress to date

- 1.12. Since WBC made known to the principal landowners its intention to propose allocation of the SEWUE, Homes England and Miller Homes have committed significant time and resource and have jointly collaborated to submit a 'Deliverable Proposition' for the site. This includes an indicative spatial plan illustrating how the policy requirements of the site can be achieved, considering the need for delivery of supporting infrastructure in both spatial and viability terms. The submitted Deliverable Proposition (August 2021) clearly demonstrates the allocation is deliverable and viable and forms part of the Council's published evidence base in support of the consultation on the UPSVLP. A further document has been prepared titled 'A Deliverable Allocation' and more information on this is contained in [Section 2](#).
- 1.13. Close collaboration between the parties, and with WBC, will continue over the coming months to ensure that upon successful adoption of the Plan, including the allocation of the SEWUE, an appropriate framework and strategy for infrastructure implementation is in place to enable development to be delivered at pace. In this regard, both Homes England and Miller Homes will utilise their significant respective skills, expertise, and resources. Both parties have a strong, proven track record of delivery and further information on how and where each of the principal landowners has supported and delivered development on similar sites previously is submitted separately on behalf of the respective parties.
- 1.14. In the meantime, the purpose of these representations is to confirm the principal landowners' overall support for the SEWUE and to identify where some amendments to the proposed policy are required, to ensure that the policy (and other related policies in the plan) meets the tests of soundness as required by the National Planning Policy Framework (NPPF) (July 2021).
- 1.15. The SEWUE is the single largest allocation for development in the UPSVLP, reflective of its strategic positioning and ability to deliver much needed new homes and supporting infrastructure. It is therefore essential that draft Policy MD2 is clear on the overall land use requirements of the site; the extent of supporting infrastructure required; and the timing, funding, and delivery mechanisms for delivery. This is particularly pertinent as the draft policy (MD2) is seeking to identify requirements that are to come forward both within and beyond the plan period. Further information on the scope of these representations is set out in [Section 2](#).

2. Framework and Scope of Representations

Policy Context

2.1. Section 3 of the NPPF sets out the Government's requirements with regards 'Plan-making'. Paragraph 16 states that plans should inter alia:

- a) *'be prepared with the objective of contributing to the achievement of sustainable development;*
- b) *be prepared positively, in a way that is aspirational but deliverable;*
- d) *contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals; and*
- f) *serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area.'*

2.2. Paragraph 31 onwards confirms the requirements of the Framework with regards preparing and reviewing plans and clearly states:

'The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.'

2.3. Paragraph 34 (Development Contributions) requires plans to set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Furthermore, the NPPF states:

'Such policies should not undermine the deliverability of the plan.'

2.4. In terms of the examination of local plans, paragraph 35 confirms plans are 'sound' if they are:

- a) *'Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring area is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) *Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) *Effective – deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

- d) *Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.'*

2.5. Reflective of the scale of the proposed allocation pursuant to draft Policy MD2 and its proposed release from the Green Belt, other sections of the NPPF are also of relevance. These include Section 5 (Delivering a sufficient supply of new homes) and paragraph 73:

'The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such developmentIn doing so, they should:

- a) *consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;*
- b) *ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;*
- c) *set clear expectations for the quality of the places to be created and how this can be maintained...; and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community;*
- d) *make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)³⁷; and*
- e) *consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.'*

2.6. Footnote 37 is relevant and states:

'The delivery of large-scale developments may need to extend beyond an individual plan period, and the associated infrastructure requirements may not be capable of being identified fully at the outset. Anticipated rates of delivery and infrastructure requirements should, therefore, be kept under review and reflected as policies are updated.'

- 2.7. Section 13 (Protecting Green Belt land) confirms the aim and purposes of Green Belt land and the basis on which boundaries can be altered i.e., where exceptional circumstances have been fully evidenced and justified through the preparation or updating of plans (paragraph 140).
- 2.8. Paragraph 142 advises on the need to promote sustainable patterns of development when drawing up or reviewing Green Belt boundaries. Additionally, plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. Paragraph 143 states that when defining Green Belt boundaries, plans should inter alia:

- a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;*
- b) not include land which it is unnecessary to keep permanently open;*
- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
- f) define boundaries clearly, using physical features that area readily recognisable and likely to be permanent.'*

Scope of representations

- 2.9. These representations have been prepared having regard to the requirements of the NPPF as a whole and particularly in respect of the specific paragraphs referred to above. They are structured as follows:
- Section 3 outlines the key areas of concern regarding the current drafting of Policy MD2; and
 - Section 4 provides commentary regarding the evidence base documents, notably the Infrastructure Delivery Plan (IDP) (September 2021) and Local Plan Viability Assessment (August 2021).
- 2.10. They are also supported by a document jointly produced by Homes England and Miller Homes titled 'A Deliverable Allocation' (November 2021). This contains supplementary information with regards the overall vision for the SEWUE allocation and how the proposed indicative spatial framework currently responds to the requirements of draft Policy MD2. For the avoidance of doubt, the 'Deliverable Allocation' document builds upon information contained within the original Deliverable Proposition (which forms part of WBCs evidence base to the UPSVLP) and the overall indicative spatial framework remains unchanged.
- 2.11. Its purpose is to reaffirm the deliverability of the allocation and to reconfirm how the principal landowners are continuing to work together, with WBC and key stakeholders, to refine proposals for the site and how its development can be implemented.

3. Response to Draft Policy MD2

- 3.1. This section provides the principal landowners comments in response to the proposed wording of draft Policy MD2 and its supporting text. By reference to relevant paragraphs, concerns with regards the current wording are identified before the proposed changes to overcome these are set out. To be succinct, all proposed changes to the policy wording being put forward on behalf of the principal landowners have been summarised in a track changed version of the policy contained at [Appendix 2](#).
- 3.2. For the avoidance of doubt, the principal landowners are supportive of there being a standalone policy for the SEWUE but do consider that draft Policy MD2 could be made more succinct through cross reference to other detailed policies of the plan (particularly in relation to development management requirements) where these are equally applicable to the SEWUE.
- 3.3. This representation has not sought to comment on every single aspect of the policy and the principal landowners are in broad agreement to those remaining elements of the policy that have not been referred to.
- 3.4. The principal landowners are also broadly supportive of the draft Policies Map in so far as this relates to the proposed allocation of the SEWUE.

Comments on Policy

MD2.1 Key Land Use and Infrastructure Requirements

2) The South East Warrington Urban Extension will deliver a minimum of 4,200 homes in total of which around 2,400 homes will be delivered within the Plan Period.

- 3.5. [Appendix 1](#) of the UPSVLP provides a housing trajectory for the development sites to be allocated. In so far as this relates to the proposed SEWUE (albeit referred to as the 'Garden Suburb Option 2 (GB Release)'), this proposes delivery of 2,430 homes in the plan period (2021-2039). The principal landowners are confident that at least this number of homes can be delivered in the plan period, through a phased approach to development which will involve several parcels of land coming forward in parallel by different developers. Additionally, Homes England in its role as the Government's housing accelerator, will look to increase the pace of delivery through its planning, enabling and disposals strategy, by working with both private and public sector partners. This means that the housing trajectory for the SEWUE can be accelerated, for example through enabling infrastructure delivery, the deployment of a "master developer" role, the use of Modern Methods of Construction (MMC) and by tenure diversification.

- 3.6. The SEWUE is the single largest residential-led allocation in Warrington both in terms of overall level of development and that which is intended to come forward in the plan period. Given evidence of housing need across the Borough and the requirement for the plan to be positively prepared to address such need, the policy should be aiming to deliver ‘a minimum of’ 2,400 homes in the plan period and the wording ‘around’ adjusted accordingly. The trajectory is based on reasonable assumptions about the minimum number of homes that can be delivered across the Homes England and Miller Homes land interests.
- 3.7. Where the Homes England land is concerned, Homes England will seek to deploy a range of tools to accelerate delivery further. [The Accelerated Delivery on Large Sites – The Homes England Approach](#) document submitted separately demonstrates the range of levers available and where these are already being successfully applied. To this end, the principal landowners are confident that the proposed wording change can be justified. It is also noted that draft Policy DEV1 (Housing Delivery) paragraph 3.a) uses the same terminology and therefore the proposed wording change would be consistent with draft Policy DEV1 also. The suggested wording change is provided at [Appendix 2](#).

3) The Urban Extension will be supported by a wide range of infrastructure as follows:

a. A range of housing tenures, types and sizes, including affordable homes, custom and self-build plots and supported extra care housing.

- 3.8. Whilst it is fully accepted and supported that the development of the SEWUE will need to provide a range of housing tenures, types and sizes including affordable homes, there is no current evidence to suggest that typologies such as custom and self-build plots or supported extra care housing are required on this specific site or in the locality. Conversely, draft Policy DEV2 (Meeting Housing Needs) states:

‘Housing for Older People

19. The Council will support applications for Supported and Extra Care Housing in accessible locations, subject to other relevant policies in the Plan...

Self and Custom Build

20. The Council will ensure a sufficient supply of plots for self-build and custom-build housing to meet the identified need on the Council’s register. Applications for self-build and custom housing development will be supported, subject to consideration against the other relevant policies in the Plan.’

- 3.9. Notwithstanding, the supporting justification for Policy DEV2 advises at paragraph 4.1.62 that the Main Development Areas ‘also have specific requirements to make provision for specialist housing for older people’ and with regards custom and self-build plots, this is ‘subject to demand on the Council’s register’.
- 3.10. On this basis, either the specific requirements for housing for older people and self and custom build plots needs to be removed from Policy MD2 and replaced by a cross-reference to Policy DEV2 (which would be consistent with the wording at paragraphs 10 and 11 of Policy MD2), or the text be updated here also to confirm that such typologies will only be required where there is evidence of need and demand at the SEWUE (see suggested wording change at [Appendix 2](#)). The current wording is not clearly written or properly justified, contrary to the requirements of paragraphs 16 and 35 of the NPPF.

b. Two 2 form entry primary schools, capable of expansion to 3 forms of entry

- 3.11. There is a lack of any up-to-date evidence to justify this very specific requirement. Whilst the principal landowners do not dispute that a development of the planned scale is likely to require new school facilities, the precise number of primary schools at any given size is inextricably linked to the timing and location of development within the allocated area and the extent to which there is any available capacity in nearby schools at that point in time.
- 3.12. For the avoidance of doubt, both the Deliverable Proposition (August 2021) and ‘A Deliverable Allocation’ document demonstrate that sufficient land has been set aside to provide for two suitably sized primary school sites. However, these are designed to mitigate the impacts of the allocation as a whole (i.e., at least 4,200 homes), not just the minimum level of housing development within the plan period. It is intended that the precise school requirements will be considered further as part of the preparation of the Development Framework (pursuant to paragraph 4 of the draft policy), informed by up-to-date evidence and future reviews of the supporting Infrastructure Delivery Plan (IDP) (September 2021).
- 3.13. To this end, the policy should not specify the number of primary schools required or their intake. Rather, it need only refer to the need for the SEWUE to accommodate on-site primary school provision commensurate with the impact of the new development based on up-to-date evidence of need and demand (see suggested wording change at [Appendix 2](#)).

c. A new secondary school to provide a minimum of 4 forms of entry

- 3.14. Similar to point b) above, there is a lack of any up-to-date evidence to justify this very specific requirement.

- 3.15. Notwithstanding, the illustrative spatial framework contained within the Deliverable Proposition (August 2021) and 'A Deliverable Allocation' document sets aside land for provision of a new secondary school on the assumption that a development of the proposed scale will require some additional school facilities to be provided. However, should any such school be provided, this would likely provide a scale of facility in excess of that which would be required to mitigate the needs of the proposed development (even taking into account housing beyond the plan period) and therefore any agreed mitigation measures or monetary contributions would need to be proportionate to the impact of the development proposed.
- 3.16. For all these reasons, the policy should not specify the scale of secondary school required. Rather, it need only refer to the need for the SEWUE to provide secondary school provision either on or off-site, commensurate with impact of the development based on up-to-date evidence of need and demand (see suggested wording change at [Appendix 2](#)). This change not only provides flexibility in terms of the scale of provision required, but the ability to meet the requirement on or off-site, dependent upon evidence of need (and the catchment area of this) in due course.

d. A new leisure facility incorporating health provision

- 3.17. The principal landowners are supportive of the requirement of this element of the policy in overall terms and consider that the wording is sufficiently flexible to enable the precise requirements to be agreed through work on the proposed Development Framework. It is worth noting that the Deliverable Proposition and 'A Deliverable Allocation' document has set aside land for a combined community leisure/health facility. Additionally, Homes England can deliver a new additional health-care facility on land out with the allocation at Appleton Cross (for which the principle of such development in this location has already been established). The principal landowners are confident in combination, there is capacity within Appleton Cross and the allocation to meet evidenced requirements.
- 3.18. Notwithstanding, we note that the IDP (Appendix 1) refers to the requirement for new community facilities under several headings. Supported by provision of appropriate evidence of need, this section of the IDP would benefit from some rationalisation to make clear what the requirements for the SEWUE are; how they relate to the scale of planned development and level of mitigation needed; and the assumed indicative cost(s) for this element of infrastructure.
- 3.19. Similarly, IDP [Appendix 2](#) appears to cut-across the items identified in Appendix 1 (for example, in [Appendix 2](#) the health and leisure requirements and costs are itemised).
- 3.20. For this aspect of Policy MD2 to be justified and effective, the Council needs to refine the evidence base such that the requirements for health and leisure facilities on the site are properly understood and the costs of their provision considered on a commensurate basis.

e. Local shops and other community facilities of an appropriate scale

- 3.21. This section of the policy and paragraph 16 refer to the SEWUE being supported by inter alia ‘other community facilities’, but no information or evidence is provided as to what might be required over and above the community facilities otherwise prescribed in the policy.
- 3.22. Unless the Council can evidence and prescribe the need for additional facilities, we propose that this element of criterion e) is deleted (see suggested wording change at [Appendix 2](#)).

i. A community recycling centre

- 3.23. The policy requires provision of a community recycling centre within the SEWUE. However, paragraph 36 of Policy MD2 refers to this serving both the SEWUE ‘and the wider South Warrington area’. Furthermore, paragraph 9.1.9 of the reasoned justification for draft Policy ENV1 (Waste Management) states:
- ‘The Council has undertaken a review of its Community Recycling Centres (CRC), which has identified a need for additional capacity in the south of the Borough. It is proposed to meet this need by closing the existing facility in Stockton Heath and providing a replacement facility in the new South East Warrington Urban Extension that will have sufficient capacity to cater for the increased capacity required.’*
- 3.24. Therefore, whilst the Council has established that there is a need for additional capacity in South Warrington (generally), there is a lack of any up-to-date evidence to justify the requirement being met on land within the SEWUE (as opposed to other sites in the locality).
- 3.25. If the facility is to be provided on land within the SEWUE, then the IDP needs to make clear where this is to be located, the scale of facility that is required and its anticipated land take (mindful that this could be a land-hungry land-use that needs buffering to protect local amenity), the strategy for, timing and costs of delivery. Importantly, the requirement placed upon the SEWUE allocation would need to consider that the new facility would be replacing an existing facility which is meeting an existing need. Therefore, both the requirement for the land (within the SEWUE) and financial contributions sought towards its delivery (again from the SEWUE) would need to be proportionate to the impact the SEWUE is generating and offset by the deficit that was being created by the closure of an existing facility.
- 3.26. In the absence of such information, neither the Deliverable Proposition nor the more recently produced ‘Deliverable Allocation’ document accommodate this land use within the illustrative spatial framework. The proposed changes to Policy MD2 (at [Appendix 2](#)) flag the recommended deletion of this clause of the policy if no robust evidence justifying its inclusion linked to development of the SEWUE, is provided.

I. Flood mitigation and drainage including exemplary sustainable drainage systems (SuDS)

- 3.27. The policy requires implementation of 'exemplary' SuDS, however, the term 'exemplary' is not expressly defined within the policy or reasoned justification or indeed elsewhere within any other policies of the plan. On this basis, it is unclear how this aspect of the policy can be effective pursuant to paragraphs 16 and 35 of the NPPF, and therefore it is proposed that this reference is removed (see suggested wording change at [Appendix 2](#)).
- 3.28. Notwithstanding, the principal landowners have every intention of bringing forward development which complies with SuDS principles as set out in the NPPF and will work closely with key stakeholders to define an appropriate surface water management strategy for the SEWUE once more site-specific technical work has been undertaken.

MD2.2 Delivery and Phasing

- 4. The principal landowners and developers will be required to prepare a Development Framework ... The Development Framework will accord with the site-specific requirements of this policy and the wider Local Plan... The Framework will be subject to consultation with statutory consultees and the local community ...***
- 5. The Development Framework will be agreed with the Council in advance of planning applications being submitted ... will be a material consideration in the determination of planning applications ... planning permissions will only be granted where they are consistent with the Development Framework.***
- 6. ...the Development Framework will provide:***
- a. A comprehensive spatial masterplan ...***
 - b. A comprehensive delivery strategy ...***
 - c. An allocation wide approach to infrastructure funding, including planning obligations.***

- 3.29. The principal landowners support the principle of preparing a Development Framework in consultation with the Council, statutory consultees and the local community in advance of planning applications being submitted. This will provide a robust and comprehensive set of guiding principles and parameters for the delivery of the SEWUE, it will determine the likely phasing of development and ensure that infrastructure comes forward in the right place and at the right time. On the basis that this will need to be agreed by the Council and subsequently act as a material consideration in determining any future applications for development, it is a powerful tool which can address many site-specific issues reflective of up-to-date evidence once it becomes available.

3.30. Paragraphs 4 – 6 inclusive as drafted are clear and can be considered justified and effective in accordance with paragraph 16 of the Framework.

7. No residential development will be permitted to commence until the funding and the programme for the delivery of a highway scheme to relieve the A49 London Road/B5356 Stretton Road junction has been confirmed and works have commenced on site. A limit of housing completions will be set until such a scheme is complete and operational.

- 3.31. The principal landowners accept that it is necessary to deliver a highway improvement scheme to relieve pressure at the A49 London Road/B5356 Stretton Road junction (Cat & Lion junction) early in the development of the SEWUE. Paragraph 7 of Policy MD2 requires that the funding and delivery programme be agreed, and the related construction commences prior to the commencement of any residential development, and indicates, albeit without precision, that housing completions will be limited until the highway scheme is complete and operational. The parameters of the policy mechanism for controlling development are, however, lacking in precision and justification and are potentially unnecessarily restrictive. For example, the policy could unjustifiably prevent development coming forward elsewhere on the SEWUE that would not materially impact upon the Cat & Lion junction because of physical separation and non-car travel opportunities such as walking, cycling and proximity to established public transport connections. It also fails to define the ‘highway scheme’ to enable an understanding of the extent of works that will be required in the context of any restriction on completions.
- 3.32. It is important to highlight that the solution for the Cat & Lion junction, whilst narrowed to an advanced range of deliverable options, is not yet finalised and agreed. Furthermore, the required works will be costly and need to be appropriately timed to be supported and delivered alongside the early phases of residential development. Whilst the principal landowners and the Council are confident that an appropriate solution will be delivered, the fact that the final detail is yet to be agreed means that the wording of the policy must be clear, yet sufficiently flexible.
- 3.33. The Local Plan will not determine the final detail of the highway scheme or any related constraint on development. Rather, this detail will be progressed to inform the Development Framework and future planning applications based upon up-to-date Transport Assessment(s). The agreed Development Framework and any conditions attached to a subsequent permission(s) will give the Council suitable control over what scheme is delivered, when it will be delivered and, if necessary, how residential development will be restricted in accordance with the progress of the works.
- 3.34. Finally, on this matter, the policy’s reference to limiting the number of housing completions until the highway scheme is complete and operational should be

amended to refer to any limit being placed on the occupation of dwellings; because occupation is the potential generator of additional vehicle movements on the network.

- 3.35. Based on the above, [Appendix 2](#) proposes alternative wording that provides no less control for the Council than the original wording but provides a clear description of what is required without restrictions that cannot presently be understood or quantified. This will make the policy precise and effective.

8. Any development adjacent to the allocation boundary must not undermine the integrity of the delivery of the South East Warrington Urban Extension.

- 3.36. The principal landowners are not convinced of the necessity for this paragraph on the basis that other policies of the Local Plan, in combination, should be sufficient to ensure that the delivery of the Plan's allocations are not compromised. It is also not clear what is meant by the word 'integrity' in the context of the policy, and how the Council would apply this? For the policy to be effective this reference should be removed with the sole focus being on the prevention of the adverse impact of any other development upon the delivery of the SEWUE and its associated infrastructure. Alternative wording to this affect is set out in [Appendix 2](#).

MD2.3 Detailed Site-specific Requirements

New Homes

9. The urban extension will provide residential development across a series of new neighbourhoods, each comprising an appropriate mix of housing in accordance with Policy DEV2, including a minimum of 30% provision of affordable housing.

- 3.37. The Development Framework will define the nature and form of development across the SEWUE and identify the proposed phases of development. As confirmed by the Deliverable Proposition and 'A Deliverable Allocation' document, the principal landowners will seek to deliver a minimum of 30% affordable housing across the SEWUE, including the new national requirement for First Homes and the other requirements of draft Policy DEV2. However, the phasing of delivery will be inextricably linked to the overall phasing strategy for the allocation.
- 3.38. On this basis, to make this aspect of the policy more precise, it would be helpful if cross-reference to the Development Framework being the mechanism to determine the approach being the appropriate tool. Alternative wording to this affect is set out in [Appendix 2](#).

10. Supported housing for older people

11. Specific provision should be made for self-build/custom build plots....

3.39. The principal landowners are satisfied with the wording of these paragraphs, subject to the wording at 3.a) above being revised to be consistent with these later paragraphs and the requirements of draft Policy DEV2.

Community Facilities

13. The Urban Extension will be required to deliver two new 2 form entry primary schools, capable of expansion to 3 forms of entry and a new secondary school providing a minimum of 4 forms of entry.

3.40. As per the comments in respect of paragraphs 3.b) and c) above, the wording of the policy ought to be less specific to reflect the absence of any evidence at this stage confirming the precise requirements for school facilities within the allocation during the plan period and beyond. Instead, these further paragraphs of the policy should refer to a requirement for 'on-site primary school provision' and 'on or off-site secondary school provision' of a scale commensurate with the impact of development (see suggested wording change at [Appendix 2](#)).

14. The new secondary school should be located centrally within the overall allocation site, whilst the new primary schools should be located to ensure all homes are within easy walking distance of a primary school, taking into account the location of existing primary schools in the area.

3.41. Considering earlier comments, the first sentence in the paragraph is not currently justified.

3.42. With regards the second sentence (dealing with the location of new primary schools), whilst the principle of the approach is agreed, this is a matter that will ultimately be determined as part of the Development Framework for the site. As such, if it is considered by WBC that it is right that the policy includes a reference to the siting of new schools (the view of the principal landowners is that this is unnecessary), the principal landowners propose that the wording of the policy is revised to identify that such matters will be considered and agreed during preparation of the Development Framework (see suggested wording change at [Appendix 2](#)).

15. The Urban Extension will be required to deliver a new leisure facility including flexible space for healthcare. The Council will support the co-location of this facility with the new secondary school.

3.43. Subject to the precise requirements for the new leisure facility being identified and its provision suitably evidenced and justified in relation to mitigating the

impacts of development at the SEWUE, the principal landowners welcome WBC's support for this being co-located with any planned secondary school facility (also to be justified) and the ability to make best use of available land and resources in planning for sustainable development.

- 3.44. Notwithstanding, both the requirement for the land (within the SEWUE) and financial contributions sought towards its delivery (again from the SEWUE) would need to be proportionate to the impact the SEWUE is generating, reflective of the fact that such a facility is likely to benefit a far wider area than the SEWUE in isolation.

16. The Urban Extension should also include local shops, a supermarket and other appropriate local services and community facilities. Any proposal for retail development above 2,500 sqm will require a retail needs assessment and be subject to the sequential assessment set out in Policy DEV5.

- 3.45. Policy DEV5 confirms that a new Local Centre will be delivered as part of the SEWUE and that all retail and leisure uses will be directed towards the Town Centre, District, Neighbourhood and Local Centres, as required by national planning policy. The first sentence of paragraph 16 is consistent with this; however, the evidence base to the UPSVLP, which includes the Deliverable Proposition, and Figure 18 of the UPSVLP illustrates several Local Centres. The second sentence, however, is neither clear in its meaning, consistent with national planning policy nor supported by the Local Plan's evidence base.
- 3.46. First and foremost, it is not clear whether the proposed Local Centre(s) is intended to be limited in scale to not more than 2,500 sqm of retail floorspace, if indeed the 2,500 sqm is reference to the proposed Local Centre itself. If this is the case it needs to be expressed clearly and the evidence to support this restriction provided. Neither requirement is currently met.
- 3.47. Secondly, the requirement for a 'retail needs assessment' is contrary to national planning policy (NPPF paragraph 90) and no justification for a departure from national policy is provided in the Local Plan evidence base.
- 3.48. Thirdly, and similarly, the 2,500 sqm trigger for a sequential assessment is a departure from paragraph 87 of the Framework, and policy DEV5, which establishes that the requirement for applying the sequential test is location-based, rather than being triggered by a floorspace. Again, no evidence is provided to justify the requirement for a sequential assessment in this instance.
- 3.49. Due to these shortcomings paragraph 16 cannot be considered justified, effective, or consistent with national policy. To rectify this failing, the principal landowners suggest that the second sentence of paragraph 16 be removed, as indicated in [Appendix 2](#).

Natural Environment

23. A scheme for measurable biodiversity net gain should be demonstrated through the use of the Defra Metric and provided for all development parcels that come forward for planning approval. Mitigation measures for loss of habitat will only be allowed if shown to be necessary by application of the mitigation hierarchy in accordance with the requirements of Policy DC4.

- 3.50. The principal landowners support the requirement to achieve biodiversity net gain (BNG) across the SEWUE. Notwithstanding this, paragraph 23 as drafted is not presently clear in its requirements. Principally, the meaning of ‘all development parcels’ is not made clear. To align with the Development Framework and provide clarity this should instead refer to ‘development phases.’ In addition, the Policy needs to allow for the situation whereby not every parcel of development will be able to achieve the desired level of BNG and may be reliant upon the provision of, for example, an earlier or later phase with a greater extent of green infrastructure and opportunities for achieving the highest quality of habitat improvement or creation.
- 3.51. To provide the Council with the comfort and control to such an approach, the principal landowners would support paragraph 23 including the requirement for the approval of an overarching BNG, or ecological enhancement strategy which demonstrates how BNG will be achieved across the SEWUE, to which each planning application, or phase of development, must have regard to and demonstrate compliance with.
- 3.52. Consequently, the principal landowners seek an amendment to achieve both the clarity and flexibility that these amendments would achieve, as set out in [Appendix 2](#).

Green Belt Boundary

24. The Green Belt boundary is defined by Stretton Road and the M56 to the south and Broad Lane, the southern edge of Grappenhall Heys and then broadly following Lumb Brook Road and Green Lane to the east. Where this boundary consists of field boundaries, these will need to be strengthened to create a new recognisable and permanent Green Belt boundary.

- 3.53. The proposed description of the Green Belt boundary does not accurately reflect that which has been drawn on the draft Policies Map. This is not unsurprising given the overall scale of the site and the way in which the boundary has been defined with reference to existing highways, field boundaries, woodland belts, etc.
- 3.54. Rather than seek to describe the boundary more clearly (in words), the principal landowners are of the view that the boundary should be defined only by cross

reference to the Policies Map and therefore that this description should be removed from the policy completely (see suggested wording change at [Appendix 2](#)). Notwithstanding, the Development Framework will propose detailed measures to strengthen the proposed Green Belt boundary further, where this is necessary and appropriate, to ensure this is durable in the longer term.

26. A scheme of compensatory improvements to the environmental quality and accessibility of land remaining in the Green Belt will be required. The improvements should be made in the immediate vicinity of the Urban Extension where possible. Financial contributions will be considered where this would help ensure that the benefits of compensatory improvements can be maximised by providing them in the most appropriate location.

- 3.55. The principle of the requirement for compensatory measures is supported by national planning policy (see paragraph 142 of the NPPF) and is one which the principal landowners support and are positively planning for in bringing forward development of the SEWUE. Indeed, the Deliverable Proposition and ‘[A Deliverable Allocation](#)’ document demonstrates that there is land controlled by Homes England which is intended to remain in the Green Belt to facilitate delivery of compensatory measures in the future. Work to define what such measures would entail and the extent to which these should be provided on this land or further afield will be undertaken in collaboration with the Council and documented through the proposed Development Framework.
- 3.56. Notwithstanding, the reference to such improvements being made ‘in the immediate vicinity of the Urban Extension’ (our emphasis) is not particularly clear and neither is it clear whether consequently, it would preclude the use of land owned by others, for example that which is owned and managed nearby to the SEWUE by the Woodland Trust. Alternative wording is proposed to ensure that the policy is unambiguous in its requirements for compensatory measures (see suggested wording change at [Appendix 2](#)).

Transport and Accessibility

27. A comprehensive package of transport improvements will be required to support the Urban Extension. Required improvements will include:

b. Improved cycling and walking routes well related to the green infrastructure network; connecting the new and existing residential areas and the South East Warrington Employment Area.

- 3.57. The delivery of well-connected cycling and walking routes is a key theme of the Deliverable Proposition and 'A Deliverable Allocation' document and an essential element of the place-making of the SEWUE, including linking this to the existing urban area. The principal landowners therefore are generally supportive of this policy requirement. It is unclear, however, how the SEWUE will be able to provide such links to the South East Warrington Employment Area specifically, what such a scheme would entail and who is responsible for delivering such a scheme, because while there are existing highway connections, the two allocations are separated by third party land.
- 3.58. Furthermore, this is not the only source of employment within the vicinity of the allocation, and it is therefore not clear why this particular area of employment has been singled out. The principal landowners support the principle of achieving such sustainable links and promoting linkages between the SEWUE and existing/ planned residential and employment areas generally. Furthermore, any need for a specific connection between the SEWUE and land further east of the allocation (i.e., at the proposed South East Warrington Employment Area) is covered by criterion e) below. To this end, it is not considered that such specific reference to this single employment area is required and therefore the suggested wording at [Appendix 2](#) alters the wording accordingly and clarifies intentions with criterion e) accordingly.

c. Providing public transport enhancements to connect the new community with the South East Warrington Employment Area; Stockton Heath; Warrington Town Centre and employment opportunities within the wider Warrington area.

- 3.59. As with b. above, the principle of achieving sustainable transport links to key destinations is supported by the principal landowners. However, more clarity is required, through the submission of evidence, to determine what the expectations are upon those delivering the SEWUE, whether this be through funding, infrastructure, or other initiatives. To ensure that the Policy is justified, and effective, further evidence is required, or more pragmatically, the addition of text cross-referencing the Policy to the Development Framework as set out in [Appendix 2](#).

e. providing an improved connection from the allocation site to the A50.

- 3.60. It is unclear why this element of the Policy has been included and worded in this way. The SEWUE has no land that is located directly adjacent to the A50 and providing an improved connection from the allocation site would require significant new highway infrastructure that is not included as an item in the IDP, and which may require third party land to deliver. What is included in the IDP, and it is assumed this Policy relates to, is a new highway link extending from the centre of the SEWUE site to the B5356 Grappenhall Lane, within land owned by Homes

England, which ultimately connects to the A50 further east. It is suggested that the Policy is reworded to read “providing an improved connection from the allocation site to the B5356 Grappenhall Lane” (see suggested wording change at [Appendix 2](#)). The terminology in the IDP, including in Appendices 1 and 2 of that document would benefit from the same change.

f. a proportionate contribution to improvements to increase capacity at Junctions 10 of the M56 and Junction 20 of the M6.

- 3.61. In order for this element of the Policy to be justified, this requirement must be evidenced, the details of the improvements made clear and the costings for these shared. Additionally, clarity as to the expectations of what is meant by “proportionate” contributions is required. For example, it is unclear which proposed developments will be expected to contribute to any improvement scheme and the basis on which a proportionate contribution would be calculated. The document “Transport Model Testing of the WBC Local Plan August 2021” forms part of WBC’s evidence base. The report includes the modelling results associated with improvement schemes for both M56 Junction 10 and M6 Junction 20, however, it is unclear what the improvement schemes comprise and what the impact of the traffic arising from the SEWUE would be.
- 3.62. Based on the evidence currently supporting both the Policy and the Local Plan as a whole, paragraph 27.f. cannot be justified and therefore the proposed amendments to Policy MD2 (at [Appendix 2](#)) highlight the potential for this criterion to be deleted pending further evidence being provided both in principle terms and to justify the level of any contribution that might be required.

g. On site safeguarding of potential mass transit routes.

- 3.63. The principal landowners are supportive of the principle of safeguarding potential mass transit routes through the design and development of the SEWUE and the Deliverable Proposition and ‘A Deliverable Allocation’ documents account for this. The principal landowners support the inclusion of this policy provided that the expectations of the policy are clearly understood and that in the event mass transit proposals are not brought forward in the future, there is flexibility to use the safeguarded land for other purposes. Consequently, the requirement for safeguarding of potential mass transit routes and the practical operation of such a policy requirement ought to be determined as part of work to prepare the Development Framework and the wording of Paragraph 27 of Policy MD2 has been adjusted accordingly (see [Appendix 2](#)).

h. A contribution towards the delivery of a connection across the Bridgewater Canal and/or Ship Canal.

- 3.64. It is apparent from the wording of this criterion that the principal requirement itself is uncertain i.e., is it a link across the Bridgewater Canal and/or the Manchester Ship Canal that is required? (our emphasis) Neither is the nature of the requirement properly stated (i.e., this being simply for a footbridge connection or a more substantial connection that is suitable for vehicles). Of even greater concern is that there is currently no available evidence demonstrating that the SEWUE gives rise to a need for the delivery of a connection, other than a sum of £10m being attributed to the SEWUE against this item in the Infrastructure Delivery Plan ([Appendix 2](#)). Whilst in the same broad spatial area, we note that the proposed South East Warrington Employment Area is not identified to contribute, and neither are other proposed allocations (or even small-scale incremental developments) all of which could benefit from improved linkages more generally.
- 3.65. Not only is this aspect of the policy unjustified, the principal landowners do not control the land in the immediate vicinity of either Canal to facilitate a new bridge construction. As such, any contribution would be contingent upon such land being secured, a suitable scheme being prepared and costed, and such costs being apportioned fairly and being reasonable in scale and kind and related back to the SEWUE (and other allocations, as appropriate). The current purported £10m contribution has no supporting evidence base justification.
- 3.66. As drafted, the UPSVLP fails to make clear the requirement itself or make a connection between the need for this measure and the SEWUE, meaning that it cannot currently be considered justified.
- 3.67. Notwithstanding, the illustrative spatial framework identified in both the Deliverable Proposition and 'A [Deliverable Allocation](#)' document demonstrates that the principal landowners can accommodate a safeguarded corridor of land to enable a future strategic connection to be delivered within their ownerships, if required and justified.

i. Other network improvements as identified by an appropriate Transport Assessment.

- 3.68. Whilst the principal landowners acknowledge and support the principle that additional network improvements might be identified and required in the future based upon more detailed technical work, it also stands to reason that the extent of measures identified in the policy will also need to be supported by an appropriate Transport Assessment. On this basis, as opposed to this point being set out as a separate criterion, proposed wording has been suggested ([Appendix 2](#)) which seeks to embed this overall principle at the outset of the paragraph (i.e., 27) and against which the need for any individual criterion would be based.

30. The Urban Extension should be supported by an area-wide travel plan, encompassing the needs of all site users. This area-wide travel plan should replace the need for a series of individual travel plans.

- 3.69. For any new development, it is important to encourage sustainable travel options from the outset and the need for a comprehensive approach to travel planning within the SEWUE is therefore fully supported by the principal landowners.
- 3.70. The scale and long-term delivery of the SEWUE, together with the fact that it will be delivered across several phases and by multiple developers, means that a single site-wide travel plan alone is unlikely to be practical, suitable, or deliverable. Alternative innovations in travel planning across the various phases should also not be stifled by an inflexible policy approach.
- 3.71. To ensure that the policy is effective, the principal landowners propose that paragraph 30 be amended to require the submission and approval of an overarching travel plan for the SEWUE, followed by a range of site-specific travel plans for each phase of development, which align with and refer to, the guiding principles of the over-arching travel plan. Alternative wording to paragraph 30 is set out in [Appendix 2](#).

31. The Urban Extension should contribute to the Council's wider aspiration of enhancing the Bridgewater Canal as a recreational resource and for the Canal's tow path to provide a cycle and pedestrian link across the Borough.

- 3.72. Whilst the principal landowners support the Council's ambitions for the Bridgewater Canal, and the opportunity that it offers as a recreational resource, the extent to which the SEWUE is expected to contribute towards this aspiration and in what manner is not made clear in the Policy and the Infrastructure Delivery Plan (IDP) is silent on the issue. Without sufficient justification and clear implications for the SEWUE's viability, this element of the Policy is at odds with paragraph 16 of the NPPF. On this basis, without further certainty paragraph 31 should be deleted from the Policy (see suggested wording change at [Appendix 2](#)).

Utilities and Environmental Protection

32. A site-wide foul and surface water strategy will be required across the Urban Extension as a whole, incorporating appropriate Sustainable Drainage Systems (SuDS) and flood alleviation measures. The surface water strategy will be required to improve on greenfield run-off rates. Development proposals will be expected to incorporate infiltration SuDS and SuDS with multi-functional benefits in preference to traditional underground storage systems.

3.73. Draft Policy ENV2 (Flood Risk and Water Management) sets out how proposals for development should respond to flood risk and water management issues across the Borough. Of note is paragraph 8 which refers to the requirement for development proposals to:

'c. use Sustainable Drainage Systems that reflect the principles set out in the adopted Warrington Sustainable Drainage Systems (SuDS) Design and Technical Guidance, unless it can be demonstrated that such techniques are impractical or would present an unacceptable pollution risk;'

3.74. Paragraph 13 of the same policy provides further information and refers to the need to accord with the requirements of national planning policy. It continues:

'The preference will be for new development to incorporate infiltration bases systems and thereafter surface level sustainable drainage systems with multifunctional benefits...'

3.75. With regards discharge requirements, paragraph 12 of Policy ENV2 and criterion a) requires 'that the current natural discharge solution from a site is at least mimicked.'

3.76. Considering the very detailed wording of draft Policy ENV2 and that this reflects the requirements otherwise stated at paragraph 32 of draft Policy MD2, it is not considered necessary to repeat the development management requirements in the allocation policy itself and instead, the requirements of the allocation in so far as they relate to utilities and environmental protection should simply cross refer to Policy ENV2 (see suggested wording change at [Appendix 2](#)). This would avoid unnecessary repetition and ensure that the policy accords with paragraph 16 of the NPPF.

3.77. The principal landowners support the drainage hierarchy set out in ENV2, in accordance with the NPPF. At this initial stage of the technical assessment process of the land within the SEWUE allocation, however, it cannot be guaranteed that infiltration, for example, will be possible. Consequently, whilst it is right that Policy ENV2 states a preference for infiltration SUDS, an expectation for the use of infiltration described in Paragraph 32 is not currently supported by any evidence. Therefore, the cross-reference to Policy ENV2 is the correct and justified approach (see suggested wording change at [Appendix 2](#)).

33. The surface water strategy should be integrated with the site's green infrastructure network in order to maximise ecological and potentially recreational benefits.

3.78. Whilst the principal landowners raise no in principle objection to this paragraph of the draft policy, it is noted that paragraph 14 of draft Policy ENV2 specifically addresses foul and surface water drainage on allocated sites and requires site-wide strategies to be prepared having regard to inter alia interconnecting phases of development and the need to maximise the contribution landscaped elements of proposals can make to reducing surface water discharge. On this basis, we question whether this aspect of Policy MD2 is required or whether like the approach being advocated above, it would be more appropriate to defer to the requirements of draft Policy ENV2 and if necessary, strengthen the wording of that policy to reflect this general principle for all new development. If policy ENV2 is strengthened, this clause of MD2 could be deleted.

34. Improvements to the water supply and sewerage network will be required, ensuring that surface water drainage is not combined with foul discharge. A site wide clean water strategy will also be required.

3.79. It is not considered that the first sentence of this paragraph is required on the basis that the requirement for adequate utilities provision as part of any new development (i.e., as a general principle) is already addressed in draft Policy INF5. Furthermore, the specific requirements relating to foul and surface water drainage are addressed through draft Policy ENV2 (referred to above).

3.80. In so far as the requirement for a site wide clean water strategy, it is noted that draft Policy INF3 (Utilities, Telecommunications and Broadband), specifically paragraph 4 states:

'4. On large development sites or sites developed on a phased basis, applicants will be required to ensure that the delivery of development is guided by site wide strategies for infrastructure (e.g. foul, surface water and clean water) which ensure coordination between phases of development...'

3.81. On this basis, it is not considered that any of the text at paragraph 34 of draft Policy MD2 is required and therefore is proposed to be deleted in accordance with paragraph 16 of the Framework (see suggested wording change at [Appendix 2](#)).

36. A Community Recycling Centre to serve the Urban Extension and the wider south Warrington area should be provided within the allocation boundary.

3.82. In accordance with the comments provided above in response to paragraph 3.i), it is not considered that this requirement has been justified in so far as its accommodation within the SEWUE and therefore it should be omitted unless evidence can be provided to the contrary. Furthermore, the evidence base (Waste Arisings and Capacity Requirements Report 2017) on which the need for a centre

in the Borough is derived, is out of date and based on previous Local Plan housing requirements which were higher.

- 3.83. Even if the requirement can be justified, it is not necessary to repeat this aspect of the policy again, unless more detailed information is to be provided as to the specific requirements for the Community Recycling Centre (based on evidence). The suggested changes at [Appendix 2](#) omit this text on this basis.

37. *The Urban Extension should be designed to mitigate the impacts of climate change; be as energy efficient as possible and seek to meet a proportion of its energy needs from renewable or low energy carbon sources in accordance with Policy ENV7.*

- 3.84. The wording of paragraph 37 is imprecise where it refers to the Urban Extension being 'as energy efficient as possible'. On the basis that such terminology is undefined, this aspect of the policy cannot be effective, and no evidence has been provided to suggest that the site allocation requirements are any different to those outlined more generally for new development pursuant to draft Policy ENV7. The principal landowners are of the view that this paragraph represents further unnecessary wording within the policy and could be readily deleted and replaced by a simple cross reference to Policy ENV7 (Renewable and Low Carbon Energy Development) and its requirements for new development (see suggested change at [Appendix 2](#)). This approach would ensure the wording of the policy serves a clear purpose and avoids unnecessary repetition in accordance with paragraph 16 of the Framework.

39. *The design and layout of the Urban Extension must incorporate appropriate measures to mitigate any noise and air quality impacts from the M56 and A49.*

- 3.85. Draft Policy ENV8 (Environmental and Amenity Protection) seeks to ensure that both the environment and existing and future residents/occupiers are not affected by major existing or potential sources of pollution, including in respect of noise and air quality. On this basis, whilst the M56 and A49 might reasonably be sources of pollution, their effects on the proposal and the need for future mitigation will need to be considered pursuant to the requirements of draft Policy ENV8.
- 3.86. On this basis and as per the approach above, it is not considered that any of the text at paragraph 39 of draft Policy MD2 is required and it is therefore proposed to be deleted (see suggested wording change at [Appendix 2](#)) pursuant to the requirements of paragraph 16 of the NPPF.

Historic Environment

41. Development within the Urban Extension will be required to be designed in order to ensure that heritage assets and their settings are conserved and, where appropriate, enhanced within the context of the overall development, through appropriate mitigation measures, having regard to the South East Warrington Urban Extension Heritage Impact Assessment.

3.87. The principal landowners question the necessity for this paragraph given the guidance on heritage assets in the Framework. Furthermore, whilst the SEWUE Heritage Impact Assessment is available, it has been undertaken reflective of a point in time and clearly as development comes forward, the assessment of heritage assets will need to take account of changes in setting. Some alternative wording is proposed at [Appendix 2](#) to better align the policy with national guidance.

Comments on Reasoned Justification

Figure 18

3.88. The reasoned justification to Policy MD2 incorporates Figure 18, which is labelled as an 'Illustrative Development Concept for South East Warrington Urban Extension'. The concept plan indicates areas for residential development, open space and local centres within the SEWUE boundary. The purpose of Figure 18 is not clear. The Local Plan Proposals Map defines the boundaries of the SEWUE and the Deliverable Proposition, which forms part of the Plan's published evidence base, provides an initial indicative spatial framework.

3.89. It is important to highlight that Figure 18 is not consistent with the published Deliverable Proposition, in terms of how the residential development parcels and green infrastructure are illustrated. The principal landowners therefore question the intention behind Figure 18 and its inclusion in the Plan, considering these inconsistencies.

3.90. It is important that the expectations of the local community are not confused by inconsistent information and whilst acknowledging that Figure 18 is illustrative, the indicative spatial framework for the SEWUE will continue to evolve and change over several years, throughout the Plan period and beyond, meaning that any concept masterplan included in the Local Plan, even if accurate at this point in time, will quickly become out of date as technical assessments and the masterplanning process advances. The principal landowners therefore consider that the Local Plan would benefit from presenting a simple boundary plan at Figure 18, if indeed the image is required at all.

4. Comments on Evidence Base

Infrastructure Delivery Plan (IDP) (September 2021) and emerging Local Plan Viability (August 2021)

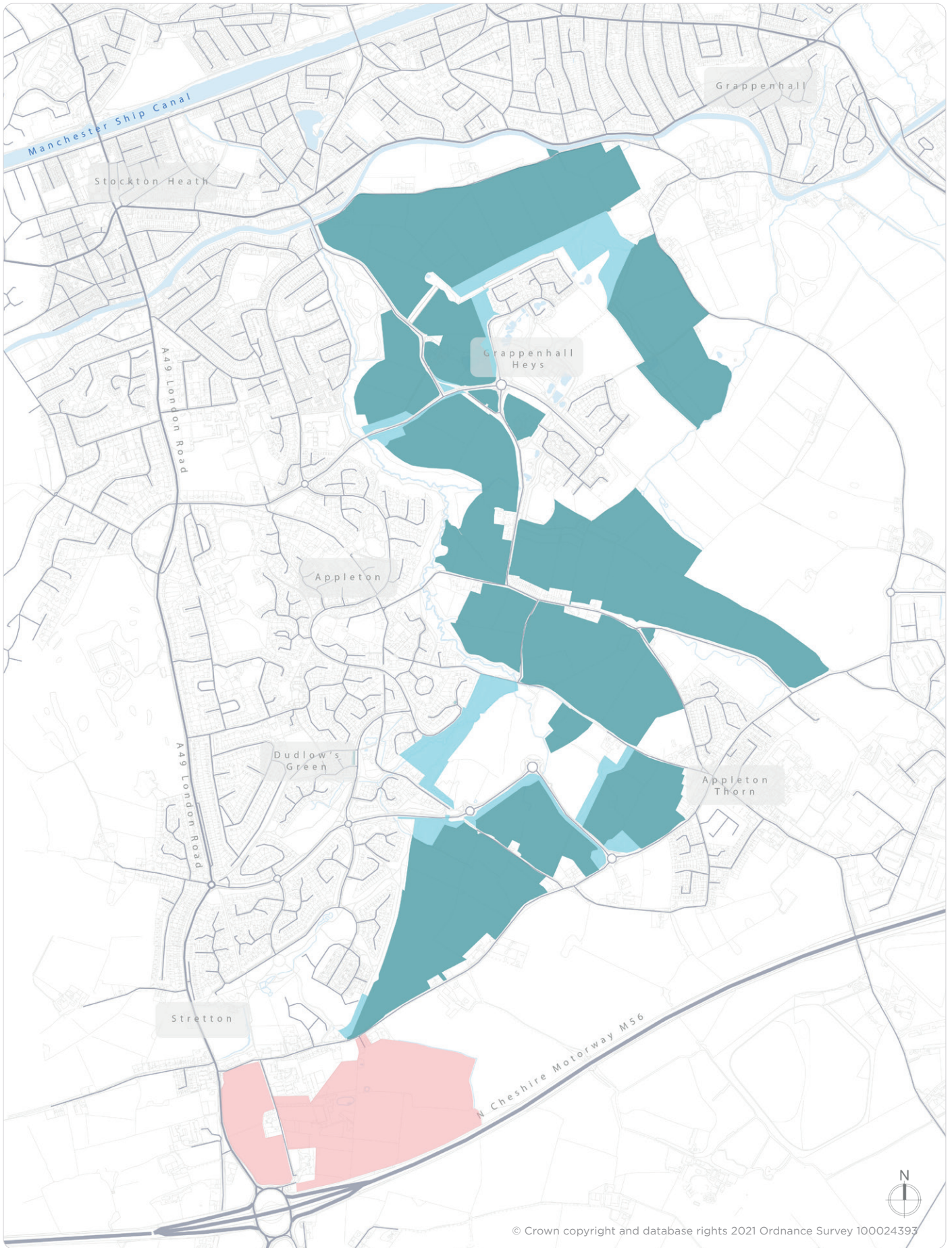
4.1. The principal landowners welcome the introductory text provided at Section 1 of the IDP, in particular paragraph 1.1 which confirms that the purposes of the IDP include assisting in 'identifying and prioritising infrastructure provision' and to act as the 'mechanism for helping identify funding priorities and any potential gaps'.

4.2. Additionally, paragraph 1.4 states:

'Any identified costs are based on the best available information at the time of publication, and will be subject to change during the plan period.'

4.3. On this basis, it is accepted that the IDP is a plan making and delivery tool and that the information contained within it is subject to ongoing review and therefore is susceptible to change.

4.4. There are aspects of the IDP (notably in Appendices 1 and 2 of the document) that the principal landowners do not agree with. However, reflective of the fact that the IDP is a 'living document' and the relative stage of the Plan making process that has been reached, it is not considered that there is any benefit in commenting on specific aspects of the IDP at this stage when, notwithstanding those concerns, the principal landowners remain confident that the allocation is deliverable and viable as demonstrated by the supporting Local Plan viability evidence, the published Deliverable Proposition and more recently produced and 'A Deliverable Allocation' document.



Appendix 1. Principal Landowner Boundaries

- Homes England Ownership
- Homes England Ownership, Gifted to Land Trust
- Land Under Miller Homes Control

Policy MD2 - South East Warrington Urban Extension

MD2.1 Key Land Use and Infrastructure Requirements

1. Land to the south east of Warrington, extending from Grappenhall Heys in the north, to the M56 in the south, as defined on the Proposals-Policies Map, will be removed from the Green Belt and allocated as the South East Warrington Urban Extension.
2. The South East Warrington Urban Extension will deliver a minimum of 4,200 homes in total of which around a minimum of 2,400 homes will be delivered within the Plan Period.
3. The Urban Extension will be supported by a wide range of development and infrastructure which will be defined as part of the preparation of the Development Framework and subsequent applications for development. This is likely to include as follows:
 - a. A range of housing tenures, types and sizes, including affordable homes, custom and self-build plots and supported and extra care housing and reflective of the requirements of Policy DEV2.
 - b. Two 2 form entry primary schools, capable of expansion to 3 forms of entry On-site primary school provision based on up-to-date evidence of need.
 - c. A new On or off-site secondary school provision based on up-to-date evidence of need to provide a minimum of 4 forms of entry.
 - d. A new leisure facility incorporating health provision.
 - e. Local shops and other community facilities of an appropriate scale.
 - f. An extensive green infrastructure network.
 - g. Playing pitches.
 - h. A range of smaller areas of open space within the residential development to serve the new community.
 - i. [A Community Recycling Centre]¹.
 - j. A comprehensive package of transport improvements, for both on-site and off-site works.
 - k. Compensatory green belt improvements and ecological mitigation and enhancement.
 - l. Flood mitigation and drainage including exemplary sustainable drainage systems (SuDS).

MD 2.2 Delivery and Phasing

¹ As set out in the main body of the Representation, this element of the policy is yet to be justified and linked to evidence of need for this requirement arising from the proposed SEWUE.

4. The principal landowners and developers will be required to prepare a comprehensive Development Framework for the South East Warrington Urban Extension. The Development Framework will accord with the site-specific requirements of this policy and wider Local Plan requirements. The Framework will be subject to consultation with statutory consultees and the local community before being finalised.
5. The Development Framework will be agreed with the Council in advance of planning applications being submitted. The Development Framework will be a material consideration in the determination of planning applications across the Urban Extension; planning permissions will only be granted where they are consistent with the Development Framework.
6. To ensure a coordinated approach to new development across the whole of the Urban Extension allocation, the Development Framework will provide:
 - a. A comprehensive spatial masterplan for the entire Urban Extension, based on the principles and requirements set out in this policy and reflecting site opportunities and constraints;
 - b. A comprehensive delivery strategy for the Urban Extension comprising:
 - c. A residential phasing plan and trajectory
 - d. An infrastructure delivery plan, with details on phasing, delivery triggers and delivery responsibilities
 - e. An allocation wide approach to infrastructure funding, including planning obligations.

~~7. No residential development will be permitted to commence until the funding and the programme for the delivery of a highway scheme to relieve the A49 London Road/B5356 Stretton Road junction has been confirmed and works have commenced on site. A limit of housing completions will be set until such a scheme is complete and operational. New highways will be provided on site to ensure permeability across the Urban Extension and to provide development parcel access. On-site safeguarding of potential mass transit routes will be implemented. Transport Assessments will identify the full package of highway works required to support the Urban Extension, however, a key intervention will include relief to the A49 London Road / B5356 Stretton Road junction; as a key constraint, a delivery strategy for this scheme will need to be agreed with the Council as a priority, with an appropriate limit on residential occupations to be set until the scheme is implemented.~~

~~7.8.~~ Any development adjacent to the allocation boundary must not undermine ~~the integrity of~~ the delivery of the South East Warrington Urban Extension.

MD2.3 Detailed Site-specific Requirements

New Homes

~~8.9.~~ The Urban Extension will provide residential development across a series of new neighbourhoods, ~~each comprising~~ based upon an appropriate mix of housing in accordance with Policy DEV2, including a minimum of 30% provision of affordable housing, in line with the requirements of the Development Framework.

~~9.10.~~ Supported housing for older people will be required within the Urban Extension. The precise nature of this will need to be agreed with the Council pursuant to Policy DEV2 and based on need and the Council's broader strategy to encourage independent living.

~~10.11.~~ Specific provision should be made for self-build/custom-build plots in the Urban Extension, subject to demand as demonstrated by the Council's self-build register pursuant to Policy DEV2.

~~11.12.~~ To ensure the efficient use of land and to reflect the area's urban fringe location, residential development will be constructed to an average minimum net density of 35dph.

Community Facilities

~~12.13.~~ The Urban Extension will be required to deliver ~~two new 2 form entry on-site~~ primary school provision and either on or off-site s, capable of expansion to 3 forms of entry and a ~~new secondary school providing a minimum of 4 forms of entry~~ provision, based on up-to-date evidence of need and at a scale commensurate with the proposed development.

~~13.14.~~ ~~The new secondary school should be located centrally within the overall allocation site, whilst the~~ The new primary schools provision should be located to ensure all homes are within easy walking distance of a primary school, taking into account the location of existing primary schools in the area. The precise location of any new school provision on-site will be determined as part of the Development Framework.

~~14.15.~~ The Urban Extension will be required to deliver a new leisure facility including flexible space for health care. The Council will support the co-location of this facility with the new secondary school.

~~15-16.~~ The Urban Extension should also include local shops, a supermarket, and other appropriate local services ~~and community facilities~~. ~~Any proposal for retail development above 2,500 sq.m. will require a retail needs assessment and be subject to the sequential assessment set out in Policy DEV5.~~

Green Infrastructure Network

~~16-17.~~ The Development Framework will define a green infrastructure network to ensure the provision of an accessible, comprehensive and high-quality network of multi-functional green spaces which connect the different parts of the Urban Extension and provide links into Warrington's wider green space network.

~~17-18.~~ In accordance with Policy DC5 a range of types and sizes of open space will be required in line with the Council's open space standards. This should include provision of local parks and gardens; natural and semi-natural greenspace; equipped and informal play areas; sports pitches; and allotment plots.

~~18-19.~~ The long-term management and maintenance arrangements for the green infrastructure network within the Urban Extension must be secured.

Natural Environment

~~19-20.~~ Development within the Urban Extension will be required to protect and enhance existing wildlife corridors and provide new corridors to link the site into Warrington's wider ecological network and the Great Manchester Wetlands Nature Improvement Area.

~~20-21.~~ The layout of new development must take into account existing landscape features, including watercourses, woodlands, significant hedgerows and contribute to the wider objectives of the Mersey Forest and have regard to sites identified in Policy DC4 (Ecological Network) which should be protected in accordance with the requirements of Policy DC4 and national guidelines.

~~21-22.~~ In accordance with Policy DC4 development within the allocation site will be required to evidence that it will not have any adverse impacts on the integrity of the Mersey Estuary Special Protection Area. If habitats within the allocation site or on adjacent land are suitable to support significant populations of qualifying species of wintering birds, avoidance measures and mitigation will be required and any planning application may need to be assessed through project specific Habitats Regulations Assessment.

~~22-23.~~ A comprehensive ecological enhancement strategy will be required to support the Urban Extension. This will demonstrate how A scheme for measurable biodiversity net gain will be achieved across the Urban Extension applying the should be demonstrated through the use of the Defra Metric, and provided for all development parcels that come forward for planning approval. Each phase of development will need to have regard to this strategy and demonstrate how it is delivering enhancements. Mitigation measures for loss of habitat will only be allowed if shown to be necessary by application of the mitigation hierarchy in accordance with the requirements of Policy DC4.

Green Belt Boundary

~~23-24.~~ The Green Belt boundary is defined ~~by Stretton Road and the M56 to the south and Broad Lane, the southern edge of Grappenhall Heys and then broadly following Lumb Brook Road and Green Lane to the east on the Policies Map.~~ Where this boundary consists of field boundaries, these will need to be strengthened to create a new recognisable and permanent Green Belt boundary. The need for such measures and the design response will be considered as part of the Development Framework.

~~24-25.~~ Development at the south west edge of the allocation will be required to respect the Green Belt boundary and the character of the washed over Green Belt settlement of Stretton to the west of the A49.

~~25-26.~~ A scheme of compensatory improvements to the environmental quality and accessibility of land remaining in the Green Belt will be required. The improvements should be made in the immediate vicinity of the Urban Extension where possible and will be identified through preparation of the Development Framework. Financial contributions will be considered towards other off-site measures where this would help ensure that the benefits of compensatory improvements can be maximised by providing them in the most appropriate location.

Transport and Accessibility

~~26-27.~~ A comprehensive package of transport improvements will be required to support the Urban Extension. The details of these and any other network improvements and how they will be achieved will be set out in the Development Framework with further confirmation of their need and details of their delivery in an appropriate Transport Assessment. Required improvements will They include:

- a. Ensuring appropriate access arrangements for the site as a whole and for individual development parcels.
- b. Improved cycling and walking routes well related to the green infrastructure network; connecting the new and existing residential and employment areas ~~and the South East Warrington Employment Area.~~
- c. Providing public transport enhancements to connect the new community with the South East Warrington Employment Area; Stockton Heath; Warrington Town Centre and employment opportunities within the wider Warrington area.
- d. Providing additional connections to the A49 to alleviate the A49 London Road/B5356 Stretton Road junction as well as improved junctions on the A49 at Lyons Lane and Longwood Road.
- e. Providing an improved connection from the allocation site to the A50B5356 Grappenhall Lane.
- f. [A proportionate contribution to improvements to increase capacity at Junctions 10 of the M56 and Junction 20 of the M6]².
- g. On site safeguarding of potential mass transit routes.
- h. [A proportionate contribution towards the delivery of a connection across the Bridgewater Canal and/or Ship Canal]³.
- ~~i. Other network improvements as identified by an appropriate Transport Assessment.~~

~~27-28.~~ The layout of development should maximise the potential for walkable neighbourhoods, with a legible hierarchy of routes, providing new footpaths and cycleways that link to existing networks beyond the site.

~~28-29.~~ Good accessibility to public transport services should be provided by ensuring that the bus routes and bus stops within the site are accessible by pedestrians and cyclists via effective footpaths and cycle routes.

~~29-30.~~ The Urban Extension should be supported by an area-wide travel plan, encompassing the overarching needs of all site users. ~~This area-wide travel plan should replace the need for a series of individual travel plans. Each phase of development will bring forward an individual travel plan outlining specific measures related to that phase and which aligns with the guiding principles of the area-wide plan.~~

~~30.~~ The Urban Extension should contribute to the Council's wider aspiration of enhancing the Bridgewater Canal as a recreational resource and for the Canal's tow path to provide a cycle and pedestrian link across the Borough.

² As set out in the main body of the Representation, this element of the policy is yet to be justified and linked to evidence of need for this requirement arising from the proposed SEWUE.

³ Same as Footnote 2 above.

Utilities and Environmental Protection

31. A site-wide foul and surface water strategy will be required across the Urban Extension as a whole, incorporating appropriate Sustainable Drainage Systems (SUDS) and flood alleviation measures in accordance with the requirements of Policy ENV2. ~~The surface water strategy will be required to improve on greenfield run-off rates. Development proposals will be expected to incorporate infiltration SuDS and SuDS with multi-functional benefits in preference to traditional underground storage systems.~~
32. The surface water strategy should be integrated with the site's green infrastructure network in order to maximise ecological and potentially recreational benefits.
- ~~33. Improvements to the water supply and sewerage network will be required, ensuring that surface water drainage is not combined with foul discharge. A site wide clean water strategy will also be required.~~
- ~~34.~~33. Development within Urban Extension must not impact on the operation of the existing gas pipeline which crosses the site.
- ~~35. A Community Recycling Centre to serve the Urban Extension and the wider south Warrington area should be provided within the allocation boundary.~~
- ~~36.~~34. The Urban Extension should be designed to mitigate the impacts of climate change; ~~be as energy efficient as possible and seek to meet a proportion of its energy needs from renewable or low carbon sources~~ in accordance with Policy ENV7.
- ~~37.~~35. Development proposals may be required to assess the impact on the groundwater environment and incorporate appropriate mitigating measures.
- ~~38. The design and layout of the Urban Extension must incorporate appropriate measures to mitigate any noise and air quality impacts from the M56 and A49.~~
- ~~39.~~36. Development within the Urban Extension will be required to mitigate air quality impacts on the Manchester Mosses SAC in accordance with Policy ENV8 (Part 4).

Historic Environment

- ~~40.~~37. Development within the Urban Extension will be required to sustain, and where possible enhance, the significance of ~~be designed in order to ensure that~~ heritage assets, including any contribution made by ~~and their settings are conserved and, where appropriate, enhanced within the context of the overall development, through appropriate~~

~~mitigation measures~~, having regard to the South East Warrington Urban Extension Heritage Impact Assessment.

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